

Before the
Federal Communications Commission
Washington, DC 20554

**In the Matter of
Empowering Parents and
Protecting Children in an
Evolving Media Landscape**

MB Docket No. 09-194

COMMENTS OF ION MEDIA NETWORKS, INC.

**Brandon Burgess
Chairman and CEO
ION Media Networks, Inc.**

February 24, 2010

ION Media Networks, Inc. (“ION”) hereby submits these comments in response to the Notice of Inquiry released by the Federal Communications Commission (“FCC”) on October 23, 2009 in the matter of Empowering Parents and Protecting Children in an Evolving Media Landscape. (MB Docket No. 09-194).

The FCC’s request for comments in this Notice of Inquiry brings up several important issues facing parents, consumers, and the media industry that should be evaluated. The availability of internet and wireless networks and the arrival of Mobile Digital Television signify that content and programming will virtually be at everyone’s fingertips and continually more accessible to all, including children. These advances provide consumers, including parents and children, with many options. An examination of parental controls for protecting children from harmful content is highly appropriate and very much needed. The potential of media as a positive influence in the development of children is the other side of the equation and should be examined as well. Appropriate media can help children learn social and problem-solving skills and positive values. The right media also can provide enriching supplemental education in math and science, increased visual and audio learning opportunities for children with disabilities, and a variety of platforms for gaining linguistic skills for all students, including those who are learning English as a second language.

ION welcomes the opportunity to share its expertise and experience with children’s programming and commends the Commission for its leadership on this issue. ION is the controlling shareholder and sole distributor for the Qubo Channel (“Qubo”), a

dedicated digital channel that is broadcast on each of the ION stations. Qubo is the country's *only* free, nationally distributed, 24/7 children's channel. Qubo launched in January 2007, covering over 80% of the United States.

Qubo occupies a unique position in the children's television landscape, providing quality programming content to an underserved age demographic. In today's television environment, there has been a programming void for the 4-8 years old audience. Other channels primarily serve either the pre-school ages (2-5 years old) or ages 6-12 and up. The overlooked 4-8 years old population segment is often "aged up" and influenced to view television programming that may not be age appropriate. Qubo is focused on filling that void, offering wholesome, pro-social programming that communicates positive values, such as respect for adults and problem-solving skills. Additionally, Qubo offers its programming simultaneously in Spanish, using a second audio programming track. This provides educational and entertaining programming for another segment of the population that tends to be underserved.

Qubo is proud to be an entertainment destination trusted by parents to deliver family-friendly programming that provides children with the building blocks for learning and the foundations for self-esteem. Our programming comes from some of the leaders in children's entertainment, two of whom are also partners in the channel. These are Scholastic Media, the award-winning entertainment and media division of Scholastic Inc., the most respected children's book publisher (*see* Appendix "A" for Scholastic Media's statement in support of its partnership with Qubo) and the leading children's animation

studio in Canada, Corus/Nelvana. Qubo programs include book-based properties that promote literacy, love of learning and the development of important problem-solving skills.

ION also embraces advancements in telecommunications that have enormous potential for expanding access to media for children. ION is a broadcast industry leader in the deployment of Mobile DTV and has made investments to ensure that this technology becomes a successful platform for Qubo viewers. Currently, ION is broadcasting Qubo as one of its pioneering Mobile DTV channels from our Washington, DC and New York City stations. We and other broadcasters are currently upgrading scores of other stations to transmit Mobile DTV. At the same time, a wide range of devices are coming onto the market that can receive the Mobile DTV signal, including cell phones, netbooks, USB dongles for laptops, personal media players, and bridge devices that receive the Mobile DTV signal off-air and retransmit it for existing Wi-Fi-enabled devices. A recent study for the Open Mobile Video Coalition indicates strong consumer demand for Mobile DTV services. (*See* Appendix “B”.) Notably, the study found that 31% of respondents with minor children in the household would give a mobile device to their child to watch in the car, and 10% would give the device to their child in the home.

Providing Qubo through Mobile DTV also could positively impact the FCC’s development of the National Broadband Plan. A recent study indicated that although minority populations lag in wireline broadband adoption, they actually lead the majority

population in adoption of wireless devices and services.¹ Devices such as smartphones are increasingly becoming the gateway devices to broadband for many Americans. By making Qubo available to handheld devices, ION is anticipating and possibly accelerating wireless adoption for minorities. Providing positive content for children wherever and whenever their parents want them to access it will further increase the value proposition for these devices.

Harnessing the power of technology to assist parents in controlling the video and audio programming to which children are exposed is a worthy challenge, and ION supports efforts to enhance parental control tools that can filter out objectionable content. However, ION strongly believes that the challenge facing parents extends far beyond blocking technologies. Keeping bad content away from kids is vital, but so is access to *positive* content – programming that parents actually *want* their children to watch.

We are proud of our product and have evidence that an increasing number of households are enjoying Qubo's programming. We hear from thousands of families who do not have access to cable but enjoy ION programming over the air. These comments, through phone, web, and mail, have exponentially increased since the conversion to digital-only broadcasting on June 12, 2009, indicating that the reach of our digital broadcast services, including Qubo, has expanded significantly as a result of the conversion.

¹ Rainie, Lee, *Internet, Broadband, and Cell Phone Statistics*, Pew Internet & American Life Project, 5-6 (Jan. 5, 2010), available at <http://www.pewinternet.org/Reports/2010/Internet-broadband-and-cell-phone-statistics.aspx>.

In addition to Qubo's over-the-air viewership, the channel is also carried on Verizon's FiOS and AT&T's U-verse services. As of January 2010, Verizon and AT&T were carrying Qubo to approximately 2.8 million and 939,000 households respectively. The commitment by these companies should be applauded. Qubo also is carried on a number of cable systems, mostly smaller operators, totaling under 2 million homes. In fact, a recent survey indicated that the smaller operators consider Qubo (as well as ION TV) to be among the channels that provide the greatest value for subscribers.²

Congress and the FCC have already acknowledged the need for broadcasters to provide educational and informational programming for children, known as E/I programming. In accordance with the 1990 Children's Television Act, the FCC adopted rules requiring broadcasters to air at least 3 hours per week of E/I programming and to adhere to other related obligations, such as providing information in advance about E/I programming and limiting commercial advertisements.

ION is a leader in providing E/I programming and stands out among its competitors for the quality and quantity of programming made available, far exceeding the Commission's minimum requirements. On average, approximately 50 hours per week of Qubo's programming meet E/I standards, which is over 16 times the FCC's requirement for each channel. The balance of programs represent a family-friendly line-up that promotes values like friendship, team building, and being kind to others,

² "15th Annual Cable Network Evaluation Survey," *Independent Cable News*, 7 (Dec. 2009), available at <http://www.independentcable.com/Issues/Dec-09.pdf>.

capturing the spirit of E/I standards and parents' expectations of quality viewing. (See a typical daily schedule in Appendix "C".)

Qubo programs like *Turbo Dogs*, an award-winning series, deliver important life messages about friendship and teamwork. *Jane and the Dragon* has been evaluated by an independent team of child development experts and educators. They found this program to be a tool to teach analytical problem solving through interactive and investigative lessons that are also entertaining. *Jane and the Dragon* also includes moral lessons woven into many of the episodic adventures. These are just two examples of a variety of choices for quality children's content on Qubo that are both educational *and* entertaining.

Qubo embraces E/I content as a virtue, not a regulatory requirement. We are committed to working closely with public interest groups, parents and consumers, and policy makers who have vocalized concerns about the availability of appropriate and quality programming. We know our viewers count on Qubo to provide a positive alternative to other content that might not be as wholesome, but which seemingly appears everywhere they turn.

ION also agrees with the Commission's concern about the harms that may arise from advertising directed to children – particularly advertising intended to influence the consumption of food. ION has been a proactive leader in its commitment to limit harmful advertising to children. Early on, Qubo adopted a set of nutritional guidelines for foods that we will accept for advertising.

To create its nutritional guidelines, Qubo enlisted the help of nationally renowned author and expert on childhood obesity, Dr. Goutham Rao, clinical director of the Weight Management and Wellness Center at the Children's Hospital in Pittsburgh. The guidelines list acceptable nutritional intake limits for meals and snacks broken down by calories and grams of fat, as well as saturated and trans fats, sugar, protein, fiber and sodium. (See Appendix "D" for Qubo's nutritional guidelines.)

In a recent Federal Trade Commission report sent to Congress that highlighted industry marketing practices to children and adolescents, ION and Qubo were noted for their leadership and refusal to air ads for unhealthy foods and beverages during children's programming.³ ION has received similar acknowledgement from the Coalition for Quality Children's Media and the Center for Science in the Public Interest.

Although our guidelines require Qubo to turn away advertising revenue, ION remains committed to combating childhood obesity through digital, online and mobile media. ION firmly believes that food advertising is an area where private media entities can express their broader commitment to the public interest by shielding children from unhealthy advertising.

In summary, Qubo is the nation's only free children's channel that is distributed nationally on a 24/7 basis. Qubo and its partners provide quality content for an

³ *Marketing Food to Children and Adolescents, A Review in Industry Expenditures, Activities, and Self-Regulation*, FTC Report to Congress, 79 (July 2008), available at <http://www.ftc.gov/os/2008/07/P064504foodmktngreport.pdf>.

underserved age group. Outreach from parents and kids indicates our over-the-air audience has grown significantly since the digital transition in 2009, and Qubo has secured carriage on Verizon FiOS, AT&T U-verse, and a number of mostly smaller cable systems. ION has been a leader in the launch of Mobile DTV, which is making Qubo available on a range of new handheld and mobile devices. Qubo embraces E/I standards and greatly exceeds the FCC's requirements for hours of programming per channel per week. And Qubo has set the industry standard for limiting the types of food for which it will accept advertising.

Despite ION's commitment to Qubo's important pro-social mission for an underserved audience, there has been no corresponding commitment to distribution by major cable or satellite multichannel video programming distributors (MVPD's). Widespread distribution on MVPD's is necessary to attract national advertisers to support a free service like Qubo. Unfortunately, carriage has been limited and slow in coming.

The Commission asks in this Notice if sufficient marketplace incentives exist to create educational content for children and families. Because of barriers to distribution, ION submits the answer is no. As an example, Qubo at the end of 2009 was carried to less than 1.9 million cable households, out of a universe of 42.1 million digital cable households in the U.S.⁴ Furthermore, there is no carriage of the Qubo channel on Direct

⁴ Statistics for total digital cable television households in the U.S. as of Sept. 2009 are available at <http://www.ncta.com/Statistics.aspx>.

Broadcast Satellite services. Most of the cable systems that carry Qubo are smaller systems, as noted above.

ION calls upon the FCC to focus its attention on incentives that could help a service like Qubo grow to reach its full potential, and to examine why many MVPD's are reluctant to carry the service. ION is not calling for a new regulatory regime in such a sensitive area as the regulation and distribution of content. However, we feel there is a role for the FCC to spotlight where the marketplace is not functioning in the best interest of kids and to encourage all parties to come together around reasonable solutions.

Despite its challenges, ION and our partners remain committed to providing Qubo as a service for the American public. ION commends the Commission's interest in and attention to children's media issues, and we look forward to working with the Commission on solutions to these questions and concerns. The availability of *quality* programming with which children and families can interact and view on all mediums, including traditional and mobile television, is perhaps the most important element for creating a healthy media environment for children.



Deborah Forte
President
Scholastic Media
568 Broadway, 11th Floor
New York, NY 10012
212-343-7880

February 24, 2010

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear: Chairman Julius Genachowski:
Commissioner Michael J. Copps:
Commissioner Robert M. McDowell:
Commissioner Mignon Clyburn:
Commissioner Meredith Attwell Baker:

Scholastic Media is a proud partner with ION Media Networks in creating and distributing **qubo**: the free, digital, over-the-air children's programming service. As a **qubo** partner and as a proven leader and innovator in producing quality children's media that entertains and educates, Scholastic Media is writing in support of ION Media Network's recommendation that the FCC focus its attention on creating incentives for educational and free, over-the-air digital programming services for children to be carried by multichannel video programming distributors (MVPDs). Such action is needed, in order for children across the nation to have access to the quality educational programming offered for free by **qubo** and other services with similarly high standards.

In 2006, Scholastic Media, joined forces with ION Media, NBC Universal and Corus Entertainment to form **qubo**, an unparalleled multi-platform children's network fueled by a deep commitment to the creation of a kid-empowering and family-friendly environment, on-air and online. Scholastic Media is the award-winning entertainment and media division of Scholastic Inc., the world's largest publisher of children's books and a leader in education technology and children's media. Scholastic Media brings to the **qubo** partnership, tremendous expertise and commitment to ensuring that children have access to quality programming that is both educational and entertaining. And our abilities continuously meet the challenges of an ever-advancing digital world.

Championing literacy, values and a healthy lifestyle, **qubo** is the only network that caters specifically to kids 4-8 years of age and features bilingual programming. This unique children's television network and companion Web site has several initiatives that emphasize its dedication to children's learning and development, including a national campaign with *Reading Is Fundamental* that promotes early childhood literacy.

Qubo is also the only children's programming service that is distributed free, over-the-air on a 24/7 national basis. In addition to supporting children's learning, healthy growth and development, **qubo** also creates opportunities for parents and children to view our programming together, making it a family destination.

Distribution opportunities must increase

Quality digital programming for children - that parents and teachers will support - is a critical need, especially for the underserved 4-8 year old audience. **Qubo** is off to a great start. However, in order for the network to reach its full growth potential and achieve a viable business model, it will require

even greater cable distribution. Gaining widespread carriage through MVPDs remains a challenge. **Qubo's** current carriage comes from smaller cable systems and launches by Comcast in a limited number of its local markets.

In closing, Scholastic recommends that the FCC focus its attention on creating incentives for educational and free, over-the-air digital programming services for children to be carried through MVPDs. All households across the nation should have access to quality programming choices for children.

About Scholastic Media

Scholastic Media has developed award winning and acclaimed programming and movies that engage the minds and hearts of children and families. Our productions have won over 100 major awards including Emmy's, Webbies and an Oscar. Some celebrated favorites include *Clifford the Big Red Dog*®, *WordGirl*™ and *The Magic School Bus* to name a few. Created by Scholastic Media, *Maya & Miguel*, is designed to entertain and educate all children while promoting cultural diversity and encouraging English language acquisition. Just recently, Maya & Miguel teamed up with First Lady Michelle Obama to promote her *Let's Move* anti-obesity initiative.

Sincerely,

A handwritten signature in black ink, appearing to read 'D Forte', with a large, stylized 'D' and a cursive 'Forte'.

Deborah Forte
President, Scholastic Media



The OMVC Mobile TV Study: Live, Local Programming Will Drive Demand For Mobile TV

INTRODUCTION

U.S. mobile consumers appear ready to embrace live mobile TV, with nearly half saying that watching live digital television (DTV) via a mobile device is appealing. This interest is driven in large part by local programming, with nearly 90% of mobile device owners expressing interest in watching live news and weather programming on-the-go.

This national study, conducted by Magid Media Labs® in partnership with the Open Mobile Video Coalition (OMVC) identifies several key aspects of the mobile DTV viewing experience, intended adoption and use, and critical business model considerations such as advertising acceptance and interest in subscription models. Key findings include:

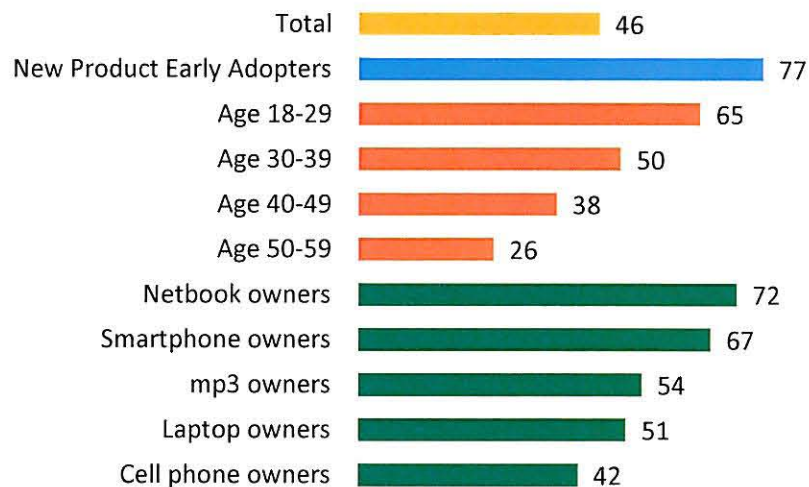
- Forty-six percent of mobile device owners find the idea of watching live digital television on a mobile device “appealing.” Strong interest is led by younger consumers and “early adopters” of new products, but is still significant among all demographics.
- Local news and information content drives live mobile DTV, with 88% of respondents expressing interest in watching this content on a mobile device. The appeal is particularly high among young adult Millennials (adults 18-29), as interest is double their current daily consumption on TV.
- Sixty-five percent of respondents expressed interest in watching some form of entertainment programming on a mobile device, as did 44% for sports.
- Mobile devices make for mobile consumption as respondents said they would watch DTV outside the home, including at work and while commuting.
- Among those with minor children in the household, 31% would give the mobile device to their child to watch in the car, and 10% would give the device to their child in the home.
- Interest in premium content is also strong, with 36% saying they would consider paying for it.
- Falling in line with interest, 47% of respondents said they are likely to consider purchasing a mobile device that allows them to watch live television programming when they are available.
- Advertising acceptance is high, with 49% saying they would watch commercials on their mobile device.
- Live programming is critical in the overall mobile DTV mix, with 51% saying they want it to be part of the experience, compared to just 18% that prefer a strictly on-demand model.

The remaining sections of this report outline the key findings from this study in greater detail.

INTEREST IN LIVE MOBILE DTV

Consumers expressed strong interest in watching live, local, mobile DTV stations on mobile devices. The near-future availability of live local news, sports, traffic, weather, emergency alerts, and other favorite programs on mobile devices appealed to 46% of all respondents, with highest interest among young adults in the Millennial generation (ages 18-29) and also a consumer segment identified as new product “early adopters.” Only 24% rated the concept as somewhat or very unappealing, while 30% were non-committal (neither appealing nor unappealing). These findings suggest that local TV can attract young Millennials if desired content reaches their preferred usage occasions. The lower, but still strong interest among the 30-39 (50%) and 40-49%) age groups also suggest the potential for wider market penetration relatively quickly, especially given the strong programming content interests for live mobile DTV discussed in this report.

Live Mobile DTV Rated as Very or Somewhat Appealing



A more strongly-conditioned question tested intent to use: What are the chances that you would use your mobile device to watch live television programs? The results were a bit more qualified, as 36% said they definitely or probably would, while 32 % said they may or may not, and another 32% probably or definitely would not. Projected usage again was highest among early adopters (71% definitely or probably), young adults (48%), owners of Smartphones (54%), and Netbooks (61%), and men (40%).

A similar percentage — 37% — of mobile device owners said they expected to watch live mobile DTV programs at least a few times a week, and 49% said they would at least once a week. The same segments identified above also were above average on this indicator.

CONTENT

When mobile DTV is available, what kinds of programs will consumers want to see?

News is the clear leader for mobile DTV content. Nine in ten respondents (88%) said they would watch at least one of several news categories measured. Most notably, interest in mobile news programming among young adult Millennials (18-29 years old) is quite strong compared to their relatively weak local news viewing on standard television sets.

Among the news categories tested, breaking news (76%), emergency reports (75%) and weather (74%) topped the list, and they tend to be localized in focus. Other types of news programs trailed but still had large support in the 50-59% range. Entertainment programs rank lower but still appeal to two-thirds of device owners.

It is well-known that television news viewing on conventional TV sets skews old. In the present survey, current *daily* viewing of local TV news programs starts at only 26% for the 18-29 age-group, then increases with age up to 65% for those 50-59.

The 18-29 Millennial age-group, however, is about average in their interest in various mobile DTV news programs tested, and they are above average in the entertainment and sports categories. For example, 52% want local or regional news, 72% each want emergency reports and weather, and 61% want live news events. These findings suggest that one of the problems with conventional TV news for young adults is that it doesn't match their preferred usage occasions.

Programs Interested In Watching On Mobile DTV		
Total	Age 18-29	
88%	92%	Net News/Weather
76%	77%	Breaking News (e.g., disaster reports, court decisions, local accidents)
75%	72%	Emergency reports (e.g., school closing, severe weather, etc.)
74%	72%	Weather
59%	52%	Local or regional news
56%	61%	Live events as they happen (e.g., important press conferences, big public events, election returns, etc.)
54%	52%	Traffic
50%	48%	National news
65%	79%	Net Entertainment
47%	60%	Situation Comedies
43%	48%	Dramas
31%	42%	Reality Programs
30%	38%	Variety Programs (e.g., Jay Leno, etc.)
15%	14%	Daytime or nighttime soaps
33%	42%	Other types of programs
44%	51%	Net Sports
35%	42%	National sports
34%	41%	Local or regional sports

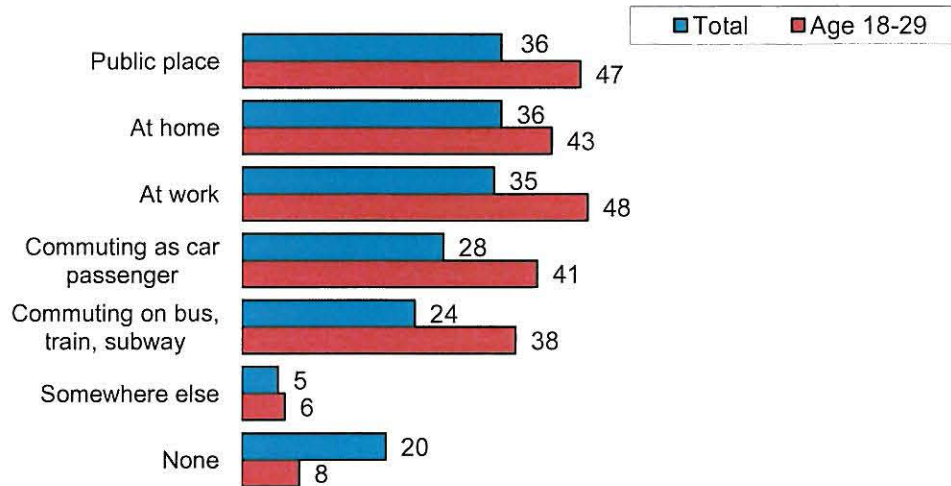
Base: Total. Multiple Responses Accepted

When it comes to mobile DTV, consumers want *both* real-time and recorded programming for mobile devices. When presented the choice, 41% of all respondents said they want both options, while 18% chose on-demand and 10% said real time. This nets to 51% wanting live and 59% wanting on-demand. Among early adopters, 52% want both real time and on-demand, while 22% said on-demand only, and 15% said real time; these results were about the same as for age 18-29 Millennials.

VIEWING ENVIRONMENT

Device owners say they likely would watch DTV programs in a variety of settings, with the top locations including public places, the home, and the workplace during breaks. Young adults and early adopters are above average for each location, which is consistent with their stronger interest in mobile DTV generally. The preferred locations seem to have little relation to preference for different types of programming.

Most Likely Locations Would Watch Mobile DTV Programs



Device Segments

Two device segments—laptops or Netbooks, and smartphones—dominate when respondents project their future live mobile DTV viewing. Those who expect to use laptops/Netbooks for mobile DTV are the larger and more broadly representative group. Smartphone ownership continues to grow rapidly and device convenience likely will increase in relevance for consumer choice.

Respondents in general said they would be most likely to watch live mobile DTV on a laptop or Netbook (45%), with 19% for Smartphones and 14% for cell phones.

However, among the 46% of respondents who rated live mobile DTV as appealing, 49% said that they would prefer laptops or Netbooks, while 31% chose Smartphones (31%). Smartphone owners prefer those devices for live mobile DTV over laptops/Netbooks by a 51% to 38% margin, while laptop or Netbook owners strongly favor those devices.

These two groups are distinct in some ways but are mostly very similar in their likely usage patterns. They are about the same in their content interests, including live mobile news. They also are very similar in expected usage occasions, although the smartphone group more likely

wants to check mobile DTV at work. They have the same desire for both live and on-demand programming, and similar interest both in premium content and tolerance for commercials.

Those favoring smartphones are somewhat younger, more affluent and are more likely to be early adopters. On the other hand, early adopters in general are just as likely to prefer smartphones as laptops/Netbooks.

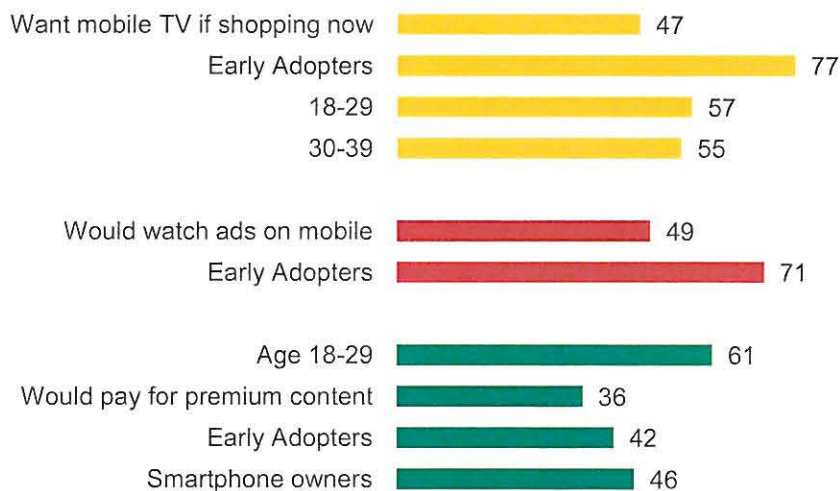
BUSINESS CONSIDERATIONS

As live mobile DTV becomes available, we see immediate opportunity for device manufacturers to capitalize. About half (47%) of device owners said they would be interested in obtaining a mobile device with live DTV capability if they were shopping in the near future for a new mobile device. The early adopter segment (77%) is well ahead of other types of respondents. The 30-39 age-group (55%) is about even with the 18-29 segment in intent to purchase as well, which indicates broader acceptance.

Opportunity also exists on the content side, with half of mobile device owners (49%) saying they definitely or probably would be willing to *watch* (not just *tolerate*) advertisements or commercials during live mobile DTV programs in order to have free access. Young adults (61%) and early adopters (71%) also are the most positive about this trade-off.

Premium content also has potential, with more than one-third (36%) of respondents expressing interest in paying for premium content, such as recent movies, premium sporting events, etc. on a subscription or pay-per-view basis. Early adopters (61%), Adult Millennials (42%) and Smartphone owners (46%) are most interested in this content.

Business Model Concept Interest



METHODOLOGY

The Open Mobile Video Coalition (OMVC) commissioned Frank N. Magid Associates' Magid Media Labs® to conduct a study to test interest in live mobile television. This research was executed in November, 2009 and is based on a national online panel sample of 1,007 respondents age 18-59. Respondent demographics were statistically balanced to ensure that the data is representative of the U.S. Internet-user population in this age-group.

To identify early adopters, the survey included five questions about propensity to shop for things that are new, to be among the first to try new technologies, and to tell others about new brands or technology. These questions were combined into a five-point index to place those who tend to be earlier or later adopters of new products. Two-thirds (65%) of early adopters are male, and early adopters skew young. While early adopters and young people overlap, they are not congruent. Almost half of early adopters are 18-29, but only about one-fourth of respondents in that age-group are early adopters.

All respondents own some type of mobile device, although they were not screened for ownership.

Conventional cell phone	78%
Smartphone (iPhone, Blackberry, Treo, etc.)	28%
Laptop	69%
Netbook	7%
Portable mp3 player	64%
Other	20%

Additional Input: OMVC Mobile TV Study

Quotes Attributable to Jaime Spencer, Director, Magid Media Labs®

On Millennials And News Consumption

- We know from previous research in our Millennials Strategy Program® that Millennials are deeply interested in local news and information. Traditional delivery methods just do not appeal to their sensibilities. Making local news and information content available on Millennials' terms greatly increases the appeal of this content.
- Millennials actually have a strong connection with local TV news brands. The more they watch, the lower their evaluations. They believe these stations have information they need, although local TV is just not delivering it in a way that is compelling for them.

On Smartphone Usage

- We see from previous studies that another quarter of the mobile phone user base presently is interested in purchasing a Smartphone. From our perspective, Smartphone penetration will reach 50% quickly.
- Smartphone users are mobile super-consumers. They are far more likely than feature phone owners to use the device for functions beyond talking and texting. In fact, Smartphone users spend more time doing things like browsing mobile Web sites on their phones than they do talking.
- The Smartphone is like a catalyst: People who get them become more than device owners. They adopt a mobile lifestyle. Live mobile DTV fits very nicely into that mobile lifestyle. As the number of Smartphones increases, so will the demand for live mobile DTV.

On Laptops

- The laptop has become a personal living tool for all generations. There is really nothing it can't do when it comes to media and communicating. As it continues to be a more important element of our lives, it only makes sense that consumers will want to use it to watch live DTV. It delivers a great combination of mobility, convenience, and a quality video experience.

On Mobile Content In General

- The mobile landscape is exploding, yet we don't see a clear leader in that space. This is especially true for the local picture. We believe that broadcasters have the opportunity to own this platform locally, but they need to be aggressive and have content that will drive use. Live DTV is a great asset here.
- Mobile phone owners associate their devices with safety and functionality. This meshes very well with the brand position of many local TV newsrooms. These stations have a great opportunity to leverage that brand connection.



QUBO CHANNEL SCHEDULE

Effective January 4, 2010

Eastern	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Pacific
6:00 AM	Maisy							3:00 AM
6:30 AM	Gofrette							3:30 AM
7:00 AM	Boo!					My Friend Rabbit		4:00 AM
7:30 AM	Postman Pat					Postman Pat		4:30 AM
8:00 AM	Elliot Moose					3-2-1 Penguins!		5:00 AM
8:30 AM	My Friend Rabbit					Elliot Moose		5:30 AM
9:00 AM	Maisy					Gofrette		6:00 AM
9:30 AM	Gofrette					Pecola		6:30 AM
10:00 AM	Boo!					Willa		7:00 AM
10:30 AM	Postman Pat					Turbo Dogs		7:30 AM
11:00 AM	Elliot Moose					Rescue Heros		8:00 AM
11:30 AM	My Friend Rabbit					Pearlie		8:30 AM
12:00 PM	3-2-1 Penguins!					Willa		9:00 AM
12:30 PM	Babar					Sitting Ducks		9:30 AM
1:00 PM	Babar					Sheldon		10:00 AM
1:30 PM	Jane and the Dragon					Zula Patrol		10:30 AM
2:00 PM	Miss BG					Jacob Two Two		11:00 AM
2:30 PM	Jacob Two Two					Miss BG		11:30 AM
3:00 PM	Adventures from the Book of Virtues					Babar		12:00 PM
3:30 PM	Zula Patrol					Adventures Book of Virtues		12:30 PM
4:00 PM	Rescue Heroes					Pippi Longstocking		1:00 PM
4:30 PM	Rupert					Rupert		1:30 PM
5:00 PM	Marvin the Tap-Dancing Horse					Rescue Heroes		2:00 PM
5:30 PM	Pecola					Rescue Heroes		2:30 PM
6:00 PM	3-2-1 Penguins!					Willa		3:00 PM
6:30 PM	Babar					Sitting Ducks		3:30 PM
7:00 PM	Babar					Sheldon		4:00 PM
7:30 PM	Jane and the Dragon					Zula Patrol		4:30 PM
8:00 PM	Miss BG					Jacob Two Two		5:00 PM
8:30 PM	Jacob Two Two					Miss BG		5:30 PM
9:00 PM	Adventures from the Book of Virtues					Babar		6:00 PM
9:30 PM	Zula Patrol					Adventures Book of Virtues		6:30 PM
10:00 PM	Rescue Heroes					Pippi Longstocking		7:00 PM
10:30 PM	Rupert					Rupert		7:30 PM
11:00 PM	Marvin the Tap-Dancing Horse					Rescue Heroes		8:00 PM
11:30 PM	Pecola					Rescue Heroes		8:30 PM
12:00 AM	3-2-1 Penguins!					Willa		9:00 PM
12:30 AM	Babar					Sitting Ducks		9:30 PM
1:00 AM	Babar					Sheldon		10:00 PM
1:30 AM	Jane and the Dragon					Zula Patrol		10:30 PM
2:00 AM	Miss BG					Jacob Two Two		11:00 PM
2:30 AM	Jacob Two Two					Miss BG		11:30 PM
3:00 AM	Adventures from the Book of Virtues					Babar		12:00 AM
3:30 AM	Zula Patrol					Adventures Book of Virtues		12:30 AM
4:00 AM	Rescue Heroes					Pippi Longstocking		1:00 AM
4:30 AM	Rupert					Rupert		1:30 AM
5:00 AM	Marvin the Tap-Dancing Horse					Rescue Heroes		2:00 AM
5:30 AM	Pecola					Rescue Heroes		2:30 AM

Subject to change

as of 1/6



Nutritional Guidelines

Summary Table for Advertising
targeted to children on:
qubo Kids Networks

Prepared by;
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(January 2008)



Nutritional Guidelines for Advertising Targeted to Children Summary Table

Eating Occasions	Prepared Foods (Main Dish)	Prepared Foods (Side Dish)	Complete Meals (Main Dish and Side Dish)	Snacks	Dairy Beverages, Yogurt and Other Dairy Products	Juice Beverages	Water/Water Based Beverages (Bottled water, synthetic drinks)	Cereal
Per Serving								
Calories (kcal)	≤ 300	≤200	≤ 500	≤ 100	≤ 100	DNA	≤ 10	≤ 200
Fat (g)	≤ 10	≤ 7	≤ 17	<3	< 3	DNA	DNA	≤ 7
Sat. Fat (g)	≤ 4	≤ 3	≤ 7	DNA	DNA	DNA	DNA	≤ 2
Trans Fat (g)	0	0	0	0	0	0	0	0
Sugar (g)	≤ 8	≤ 5	≤ 13	< 6	< 6	DNA	DNA	≤ 12
Protein (g)	NR	NR	NR	≥ 2	≥ 2	DNA	DNA	
Fiber (g)	≥ 3	≥ 2	≥ 5	DNA	DNA	DNA	DNA	NR
Sodium (mg)	< 800	< 500	< 1300	< 200	< 200	DNA	DNA	< 250
Notes	A		F	B,C	D	E		

Notes:

- A. Meats, poultry, and seafood (processed, and unprocessed): Advertising of processed meats (e.g. hot dogs) is not acceptable. Advertising of unprocessed meats, poultry or seafood without added oil or sugar (e.g. canned tuna in spring water) is acceptable.
- B. Fruits, vegetables, legumes, condiments, and spreads: No restrictions on fresh fruits or vegetables which are an ideal snack. Fruits, vegetables, and legumes in other forms (e.g. canned, fruit cocktail, peanut butter, other nut butters etc.) should be accepted when they have no added sugar or oil. No restrictions at this time are recommended for advertising of condiments (ketchup, mustard, mayonnaise, salsa, salad dressings).
- C. Breads and pastries: should meet the following guidelines per serving: ≤ 200kcal; ≤ 5 g fat; zero g Trans fat.
- D. Dairy products: No restrictions except for those that do not meet the snack guidelines (e.g. high fat, high sugar ice cream, etc. Dairy consumption has been shown to be **inversely related** to the risk of obesity. Consumption of low fat milk (1% fat or less) as a refreshment should be encouraged.)
- E. Juice Beverages: Consumption should be limited to no more than one small serving of no more than 6 ounces per day and this should be indicated in the proposed advertisement.

- F. Qubo's limit for sodium content of complete meals is based on the following: Evidence linking specific levels of sodium consumption in children to ill health (including obesity) is generally lacking. Nevertheless, the Institute of Medicine (IOM) recommends a total daily sodium intake of between 1500 and 2200 mg per day for children ages 1 – 13.¹ A total of 1300 mg for a complete meal (likely to be the largest meal of the day) is therefore reasonable.

NR – No restrictions DNA – Does Not Apply Per serving is not a factor

As of January 2008)

¹ Institute of Medicine. *Dietary Reference Intakes for Water, Potassium, Sodium, Chloride and Sulfate*. Washington, DC: National Academy Press, 2004.

Examples of Guidelines:

EATING

OCCASIONS/FOODS:

MEETS GUIDELINES:

DOES NOT MEET GUIDELINES:

PREPARED FOODS

AMY'S Asian Noodle Stir Fry
Oscar Meyer Fat Free Wieners

Hot Pockets Beef and Cheddar stuffed
Sandwiches
Oscar Meyer Regular
Wieners

SNACKS

Nabisco 100 Calorie Mini-Teddy Grahams

Reese's Peanut butter cups

BREAKFAST/ CEREALS/BARS

G. Mills Cherrios
Kellogg's Lot Fat Nutri-grain Waffles

Cocoa Puffs
Kellogg's Eggo Banana Bread Waffles

JUICES/ Beverages

100% Fruit Juice - Limited consumption
Water

Pepsi, coke etc